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October 19, 1984

Mr. William N. Hedeman, Jr., Director Office of Emergency and Remedial Response (WH-548) U.S. Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460

> Re: Proposed Amendment to CERCLA National Priorities List, 49 Fed.Reg. 40320 et seq. (October 15, 1984)

Dear Mr. Hedeman:

RIDGWAY M. HALL, JR.

(202) 452-5452

We represent William Charles Ltd. and Winnebago Reclamation Service, Inc., of Loves Park, Illinois. Williams Charles Ltd. is the owner, and Winnebago Reclamation Service, Inc. is the operator, of the solid waste management facility, licensed by the State of Illinois, which is known as Pagel's Pit. This site was proposed for inclusion by EPA on the National Priorities List on October 15, 1984, in Group 6, 49 Fed.Reg. at 40329.

I am writing to request a 60-day extension of the time for submission of written comments from the initially prescribed date of December 14, 1984, to and including February 12, 1985. The reason for this request is as follows. Pagel's Pit is located not far from a site which is already on the CERCLA National Priorities List, namely, the Acme Solvents site in Winnebago County. We believe that EPA Region V, in evaluating the Winnebago Reclamation/Pagel's Pit site, erroneously attributed waste from the Acme Solvents site to Pagel's Pit. In order to verify this, our client has requested and received a proposal from Warzyn Engineering Inc., of Madison, Wisconsin, to perform groundwater sampling and analysis in the area and to prepare a written report which can be submitted to EPA as part of our rulemaking comments in support of our request that the Pagel's Pit site be re-evaluated and not included on the final National Priorities List. Warzyn Engineering has advised us, however, that it will take them approximately 16 weeks to perform this work.

Mr. William N. Hedeman, Jr. October 19, 1984
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A contract will be issued to Warzyn Engineering within the next few days so that work may commence as expeditiously as possible. However, an extension of the comment period until February 12, 1985, is necessary to enable us to submit the necessary study to EPA for its timely consideration. We ask therefore that you grant this request.

Sincerely yours

Ridgway M. Hall, Jr.

cc: VMr. Russell H. Wyer, Director Hazardous Site Control Division Mr. Joseph R. Gearo, Jr. Hazardous Site Control Division